

RUSSIAN RIVER PROPERTY OWNERS ASSOCIATION
3845 HWY. 128 GEYSERVILLE, CA.
95441

July 3 20



State Water Resources Control Board
POBox 100
Sacramento, Ca.
95812

Dear Chair Hoppin, Members of the Board, and Staff:

The Russian River Property Owners Association (120 members) formally requests that Alexander Valley be excluded from the proposed Frost Protection regulation until farther data are collected. To form a regulation without knowing the problems is the same as prescribing a cure before the illness is known.

Neither the Water Board staff, nor the NOAA Fisheries staff appear to understand the hydrological or geological character of Alexander Valley. Especially the tributaries when they reach the valley floor

We have been unjustly accused of harming threatened fish by both the Water Board staff and NOAA Fisheries staff. It is time to dispense with Knee Jerk reactions and look for facts.

We support the regulation of any stream that is subject to dewatering by pumping, but one set of rules for the entire area is completely unfair.

RRPOA has been committed to sound science and will continue to expand our stream monitoring program. Based on the data that you have already received, we feel that we should be excluded from an area wide regulation.

We sincerely hope that unseasonal use of water will not be confused with unseasonal use of power.

Respectfully submitted,

President, RRPOA

COMMENT LETTER RE: PROPOSED FROST REGULATION